

Garyg Miller  
05/20/2005 04:49 PM

To: Eric Pastor <eric.pastor@pbwllc.com>  
cc: Gustavo Chavarria/R6/USEPA/US@EPA, John  
Hepola/R6/USEPA/US@EPA, Barbara Nann/R6/USEPA/US@EPA,  
Pam Phillips/R6/USEPA/US@EPA, Sam  
Subject: Re: Follow-up SOW Questions

Eric,

See below.

Regards,

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m>

05/19/2005 04:16 PM

To: Garyg Miller/R6/USEPA/US@EPA  
cc:  
Subject: Follow-up SOW Questions

Hi Gary -

Thanks for discussing risk assessment issues with Kirby and me this morning. As I mentioned on our call, I have few other questions I would like to run by you. I am probably going to be unavailable for the rest of the afternoon and I know you have a full day tomorrow, but I still wanted to see if we could discuss the following:

IRA:

1 - With regard to the evaluation of wipe sample data, I was thinking of proposing wording along the lines of:

"Wipe sample analytical results shall be compared to existing surface area screening criteria for PCBs and lead, as applicable to industrial land use scenarios. Screening criteria for other analytes detected in one or more wipe samples shall be developed assuming industrial land use and based on appropriate guidance or methodologies available in the literature." Obviously I have not had a chance to run this by the group, but wanted see if it sounded close to you.

*We should discuss this further. While protocols exist for PCBs and lead, there may not be any available methods or screening criteria for many of the other potential contaminants.*

2 - I planned on adding a caveat to the IRA SOW schedule to the effect that the 120-day time period would be extended by the time required for IRA Work Plan review and approval. Also I thought I ought to clarify that if any follow-up pressure washing were required due to wipe samples exceeding screening criteria, that follow-up work would not count against the 120-day time period for field activities. Do these clarifications sound reasonable?

*A better scheduling approach may be to run the clock from the day that regulatory comments are*



*received on any work plan or report. We could say that the action will be completed and report submitted within 60 days, for example, of receipt of regulatory comments on the draft workplan. Any necessary revisions to the work could be performed and documented after work completion in a final report, for approval. Regarding the work schedule, the timing for any field activities can be impacted by a number of things. Planning and scheduling for the work should be flexible enough to provide for some amount of this. Having said that, there may be some provisions in any agreement we develop that could address appropriate extensions.*

SI/RA:

1 - In our meeting on Tuesday, we never finalized the initial list of metals analytes. I can't remember if you were OK with me proposing a list in the revised SOW or if you were going to develop a list.

*We should stay with the full analyte list in methods SW-846 6010 and 7470/7471 for metals, as well as the full lists for the other methods, as listed in the comments we provided regarding the work plans.*

2 - As a follow-up to our discussion about using biased and coarse grid samples for developing an analyte list for subsequent finer grid sampling, I wanted to discuss what coarse-grid spacing might work for you. I also wanted to discuss how we might fit the soil samples from the vacant lot SW of the site into this iterative process.

*We should stay with the grid spacing that we outlined in the comments regarding the work plans. This spacing already includes a courser grid north of Marlin Avenue. Regarding the vacant lot, the grid should be a maximum of 100 feet as described in our work plan comments. The analyte list for any additional grids required to define the extent, outside of the original areas, may be adjusted based on which contaminants (and their daughter products) are present.*

3 - I was unclear on the number of samples from the biased sample locations. Were you thinking 2 sample depth intervals from each location, as for the grid sample locations, or one sample per location as proposed for the biased samples in the SOW?

*The sampling protocol for the biased samples should be the same as the grid sampling, i.e., 2 sample depth intervals.*

I am available all morning tomorrow, but will probably be tied up from 1:30 to 4:00. Please call me at your convenience. I appreciate your help!

Thanks.

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